



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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March 12, 2025

**BY ECF**

Honorable Barbara Moses  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Peter Rodriguez v. City of New York, et al.,  
20 Civ. 9840 (JHR) (BCM)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney representing the City of New York, Captain Shaday Gibson, Captain Bonar Moise, Correction Officer Temir Williams, and Correction Officer Peter Ferraro in the above referenced matter.

In accordance with the Court's Order dated March 3, 2025 (ECF No. 162), I write to submit the following documents as directed by the Court:

1. The complete transcript of plaintiff's September 13, 2022 deposition, docketed above at ECF No. 164;
2. Copies of all written interrogatory answers and Request for Admission responses served on plaintiff by defendants, annexed to this letter as Exhibits, which include:
  - a. Defendants' Responses and Objections to Plaintiff's Local Civil Rule 33.2 Interrogatories and Request for Production of Documents, dated March 19, 2021
  - b. Defendants' Responses and Objections to Plaintiff's Requests to Admit and Requests for Production, dated September 16, 2022
  - c. Defendants' Supplemental Responses and Objections to Plaintiff's Requests to Admit, dated October 26, 2022

3. Electronic copies of all videos produced in discovery, which have been sent via email to Moses\_NYSDChambers@nysd.uscourts.gov as directed.

Respectfully Submitted,

Joseph Zangrilli /s/

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Cc: **VIA FIRST CLASS MAIL**

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